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**From:** Carlin, Jayne  
**To:** Labiosa, Rochelle  
**CC:** Waye, Don; Allison Castellan; Turvey, Martha; Henning, Alan; Wu, Jennifer  
**Sent:** 4/24/2014 5:09:17 PM  
**Subject:** Comments on ODEQ's nutrient management program document  
**Attachments:** DRAFTFormattedNutrientProgram2013\_RL JC Cmts.docx

Hi Rochelle,

I agree with Jenny. Oregon does a great job in explaining what currently exists in their program but fails to discuss gaps or provide a strategy to address those gaps.

I have attached detailed comments. Note that since this strategy was submitted to EPA during January 2014, it does not include Oregon's OR CZARA submittal of March 2014 which includes additional information about new development, forestry, agriculture and on-site disposal program that could be included in this document.

Cheers,

Jayne

PS I forwarded this document to the Oregon CZARA technical team and to the Oregon 319 coordinator so am cc'ing them with my response.

PPS May want to include an appendix on the HAB Strategy

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<http://www.epa.gov/r10earth/tmdl.htm>

**From:** Wu, Jennifer  
**Sent:** Thursday, April 24, 2014 12:11 PM  
**To:** Labiosa, Rochelle; Carlin, Jayne  
**Subject:** RE: FW: overarching comments on ODEQ's nutrient management program document

Hi Rochelle – thanks for sharing. It was a good read and overview. A couple of questions are on who the audience is. If it's the general public vs. a technical audience, that would make a difference to me on the level of technical detail. From an overview standpoint, I thought it was good.

The only additional section I would suggest that Oregon add is a Next Steps section. That is, if they intend to do anything different in any of the areas, they should summarize it. It looked like they might do more with the HAB strategy, but other than that, it seemed to indicate a continued ad hoc approach. I'm actually not opposed to that, because I think we're asking a lot from the State. I guess perhaps it would be a good idea to at some point, talk with Christine and find it in the universe of what Oregon is planning to do what we want to emphasize and not.

It seems clear that where there are gaps and where improvements can be made are on developing numeric nutrient criteria (if they wanted to do this) and tracking implementation of nutrient reductions. Perhaps that could be another section where they ID strengths and gaps of their nutrient program. Freshwater Trust is working with DEQ and ODA on tracking implementation to reduce nutrients, and there are some efforts going on in several basins, so I feel like there's some progress being made, though maybe not in a focused strategy sort of way.

-Jenny

**From:** Labiosa, Rochelle  
**Sent:** Thursday, April 24, 2014 10:40 AM  
**To:** Carlin, Jayne  
**Cc:** Wu, Jennifer  
**Subject:** FW: FW: overarching comments on ODEQ's nutrient management program document  
**Importance:** High

Hi Jayne and Jenny,

A long time ago (January) ODEQ sent a summary of their nutrient program to us for review. I reviewed (my comments on the document are attached), and I had asked Christine to review and/or find the right people to review it. Unfortunately, she has not had time for review. Dru gave me some comments – and I discussed this with her yesterday, and CZARA came up so we thought you might want to take a peek and/or check what I have said vis a vis what we are saying on CZARA. Unfortunately, Aron has asked for the comments this week, so this would mean taking a look today if possible.

Thanks so much, Rochelle

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**From:** Labiosa, Rochelle  
**Sent:** Wednesday, April 23, 2014 2:57 PM  
**To:** Keenan, Dru  
**Subject:** FW: FW: overarching comments on ODEQ's nutrient management program document

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**From:** Labiosa, Rochelle  
**Sent:** Friday, April 11, 2014 11:17 AM  
**To:** Keenan, Dru  
**Subject:** FW: overarching comments on ODEQ's nutrient management program document

Hi Dru,

Christine was going to review these comments before I sent but she has not had a chance. Do you mind taking a quick look? I tried to reflect the comments you gave me verbally. I am planning to send when I return to the office after spring break.

Thanks, Rochelle

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**From:** Labiosa, Rochelle  
**Sent:** Wednesday, March 26, 2014 3:08 PM  
**To:** Psyk, Christine  
**Subject:** IDEQ talk from nutrients roadshow and FW: overarching comments on ODEQ's nutrient management program document

Hi Christine,

Here are the two documents you requested – I also have all presentations from the roadshow on the G drive in case you are missing any presentations:

G:\Baker\Water and Watersheds\Water Quality Standards\nutrients\2014\_nutrients\_roadshow

Just let me know if anything else would be helpful for your update to HQ.

Rochelle

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**From:** Labiosa, Rochelle  
**Sent:** Monday, March 10, 2014 12:11 PM  
**To:** Psyk, Christine  
**Subject:** overarching comments on ODEQ's nutrient management program document

Hi Christine,

I am attaching my comments (reflecting some from Dru) on ODEQ's nutrient management program document.

Overall, it was encouraging to see that ODEQ could address each of EPA's seven steps. However, the program could roughly be for any pollutant –very few actions were nutrient-specific.

They lack citations for a lot of the upfront comments about the status of nutrient pollution in Oregon surface waters, many of which are oversimplifications. They then speak to some identified problem areas but do not cite to data or studies. In all cases, there should be citations and/or plots. More maps would also be helpful to illustrate the work going on.

The watershed prioritization piece could be better fleshed out – they mention that their process for TMDL prioritization is ad-hoc, but they could speak more to the basin water quality assessments that they conduct, their monitoring and evaluation methodologies, and how they assess impairment in a more cohesive way (provide more detail). They are also missing the methods on translating from the criteria that they link to nutrients (response variables) to setting numeric nutrient targets, methods, challenges and utility of their methodology. For proactive/protectiveness, they could also speak more to antidegradation and how that plays a role in their work.

A more comprehensive approach following the CWA programs would be better, ie, first talk about the designated uses they are protecting from nutrient pollution; the criteria they have on the books; the monitoring and assessment methodology; how antideg works for nutrient impacts; if impaired, their approach to TMDLs; and then back to how they assess improvement and reduce impairment (and maybe some case studies that showed improvement with their current approach). Dru suggested that they organize by Part 1 – Prevention and Monitoring, and Part 2: Response actions.

Thanks and let me know what you think – I mentioned to ODEQ at the roadshow that we would get back to them shortly with our comments.

Rochelle

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